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5 *Attorneys for Plaintiffs*

6
7 **UNITED STATES DISTRICT COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA**

9
10 A.H., et al.,

11 Plaintiffs,

12 v.

13 COUNTY OF SAN BERNARDINO, et
al.,

14 Defendants.

Case No. 5:23-cv-01028-JGB-SHK

Assigned to:

Hon. District Judge Jesus G. Bernal
Hon. Mag. Judge Shashi H. Kewalramani

**JOINT STIPULATION FOR AN
EXTENDED BRIEFING SCHEDULE
ON DEFENDANTS' ANTICIPATED
DISPOSITIVE MOTION;
STIPULATION TO DISMISS
CERTAIN CLAIMS**

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17 **TO THIS HONORABLE COURT:**

18 **IT IS HEREBY STIPULATED** by and between Plaintiffs A.H. and H.H, in
19 each case a minor, by and through their guardian *ad litem* Crystal Hanson,
20 individually and as successor in interest to Shane Holland, deceased; CHLOE
21 HOLLAND, individually and as successor in interest to Shane Holland, deceased,
22 and PATRICIA HOLLAND, individually, and Defendants COUNTY OF SAN
23 BERNARDINO and JUSTIN LOPEZ ("the Parties"), by and through their
24 respective attorneys of record, as follows:

- 25 1. The Parties have met and conferred regarding Defendants' anticipated motion
26 for summary judgment. The meet and confer discussions began on July 24,
27 2024 via email and written correspondence and continued by phone call on
28 August 2, 2024.

- 1 2. During the meet and confer process, the Parties have narrowed the issues to
 2 be raised in Defendants' motion for summary judgment, and the Parties also
 3 agreed to an extended briefing schedule.
- 4 3. Accordingly, the Parties stipulate and agree as follows: Plaintiffs shall dismiss
 5 the following claims asserted in their operative complaint: (1) Claim 1,
 6 Unreasonable Detention and Arrest (42 U.S.C. § 1983); (2) Claim 3, Denial
 7 of Medical Care (42 U.S.C. § 1983); (4) Claim 4, Municipal Liability –
 8 Inadequate Training (42 U.S.C. § 1983); (5) Claim 5, Municipal Liability –
 9 Unconstitutional Custom, Practice, or Policy (42 U.S.C. § 1983).
- 10 4. The Parties also agree that Plaintiffs shall have two weeks to oppose
 11 Defendants' motion for summary judgment, and Defendants shall have two
 12 weeks thereafter to file any reply brief. The Parties respectfully request a
 13 brief continuance of the last day for this Court to hear Defendants' motion to
 14 accommodate this extended briefing schedule.
- 15 5. The Parties stipulate that GOOD CAUSE exists for this Court to order the
 16 following briefing schedule, including because the Parties have a mediation
 17 scheduled in this case to take place on September 9, 2024, which could
 18 potentially result in the hearing coming off calendar:

Event	Current Date	Proposed Date
Last Day to Hear Dispositive Motions	September 9, 2024	September 23, 2024
Last Day to file a Reply Brief re: Dispositive Motion	August 26, 2024	September 16, 2024
Last Day to file an Opposition to a Dispositive Motion	August 19, 2024	September 2, 2024
Last Day to file a Dispositive Motion	August 12, 2024	August 19, 2024

26 **IT IS SO STIPULATED.**

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1 DATED: August 6, 2024

**MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP**

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3 Bv: /s/ Kayleigh Andersen
4 Eugene P. Ramirez, Esq.
5 Kayleigh A. Andersen, Esq.
Attorneys for Defendants, County of San
Bernardino and Justin Lopez

6 DATED: August 6, 2024

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8 Bv: /s/ Renee V. Masongsong
9 Dale K. Galipo, Esq.
Renee V. Masongsong, Esq.
Attorneys for Plaintiffs